

JAMES D. URRUTIA, ESQ.
Nevada Bar No. 12885
LJU LAW FIRM
7575 Vegas Drive, Suite 100
Las Vegas, NV 89128
T: (702) 707-9433
F: (702) 702-2194
James@TheLJU.com
Counsel for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GERARDO PEREZ,

Plaintiff,

vs.

JENNIFER NASH, et al.,

Defendants.

CASE NO.: 2:21-cv-00075-RFB-MDC

JOINT DISCOVERY PLAN AND SCHEDULING ORDER

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1(e), Plaintiff, by and through his attorney of record, James D. Urrutia, Esq. of the LJU LAW FIRM, and Defendants, Gregory Bryan And Jennifer Nash, by and through their attorney of record, Leo Thomas Hendges Esq. of OFFICE OF THE NEVADA ATTORNEY GENERAL, and Defendants LaDeana Morgan, LPN, Carlos Narveaz, N. Samburg and Gerald Walker, APN by and through their attorney of record, Jacob B. Lee, Esq. of STRUCK LOVE BOJANOWSKI & ACEDO, PLC and Gina G. Winspear, Esq. of DENNETT WINSPEAR LLP, hereby submit the following Discovery Plan and Scheduling Order.

Defendants Gregory Bryan and Jennifer Nash filed their Answer on March 30, 2022.

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Defendants LaDeana Morgan, LPN, Carlos Narveaz, N. Samburg and Gerald Walker, APN have not filed an Answer to Plaintiff's Complaint.¹

1. Discovery cut-off date. The first Defendant answered or otherwise appeared on March 30, 2022. The case has been stayed. The Discovery cut-off date is **WEDNESDAY, AUGUST 28, 2024**.

2. Amending the Pleadings and Adding Parties. The deadline to amend the pleadings and add parties is **THURSDAY, MAY 30, 2024**.

3. Expert and Rebuttal-Expert Disclosures. The deadline to disclose experts is **FRIDAY, JUNE 28, 2024**. The deadline to disclose rebuttal experts is **MONDAY, JULY 29, 2024**.

4. Dispositive Motions. The deadline to file dispositive motions is **FRIDAY, SEPTEMBER 27, 2024**.

5. Pretrial Order. The deadline to file a pretrial order is **MONDAY, OCTOBER 29, 2024**, or 30 days after the Court rules on any dispositive motions, whichever is later.

6. Fed. R. Civ. P. 26(a)(3). The disclosures required by this rule and any objections to them must be included in the joint pretrial order. [Unless the parties stipulate otherwise in this proposed discovery plan and scheduling order and the court so orders.]

7. Alternative Dispute Resolution. The parties certify that they met and conferred

¹ On March 2, 2023, these Defendants (collectively, "CoreCivic Defendants") entered a special/limited appearance for the purpose of responding to Plaintiff's Request for Default, preserving all applicable defenses, including all service-related defenses. (Dkt. 106.) As stated in their Response to Plaintiff's Request for Default, the CoreCivic Defendants have not been properly served, and the time to do so has long since expired. (Dkt. 107.) The CoreCivic Defendants are preparing and will soon file a Motion to Dismiss based on, among other things, Plaintiff's failure to timely and properly serve them. By complying with the Court's February 23, 2024 Order to meet and confer with the other parties and submit a proposed Scheduling Order, the CoreCivic Defendants do not waive these objections, but expressly preserve them.

about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.

8. Alternative Forms of Case Disposition. The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

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Electronic Evidence. The parties certify that they discussed whether to present evidence in electronic format to jurors for the purpose of jury deliberations. [Applies only in cases in which a jury trial has been demanded. If applicable, state any stipulations the parties reached regarding providing discovery in an electronic format compatible with the court's electronic jury evidence display system.]

Dated this 1st day of March, 2024.

Dated this 1st day of March, 2024.

LJU LAW FIRM

Office of the Nevada Attorney General

/s/ James D. Urrutia

/s/ Leo Thomas Hendges

JAMES D. URRUTIA, ESQ.

LEO THOMAS HENDGES ESQ.

Nevada Bar No. 12885

Nevada Bar No. _____

7575 Vegas Drive, Suite 100

555 E. Washington Ave Suite 3900

Las Vegas, Nevada 89128

Las Vegas, NV 89101

Counsel for Plaintiff

Counsel for Jennifer Nash and Gregory Bryan

Dated this 1st day of March, 2024.

Struck Love Bojanowski & Acedo, PLC

/s/ Jacob Brady Lee

JACOB BRADY LEE, ESQ.

Nevada Bar No. 012428

3100 W. Ray Road, Ste. 300

Chandler, AZ 85226

Gina G. Winspear, Esq.

DENNETT WINSPEAR, LLP

Nevada Bar No. 005552

3301 N. Buffalo, Suite 195

Las Vegas, NV 89129

Counsel for CoreCivic Defendants

ORDER

IT IS SO ORDERED. The parties must use the correct case number 2:21-cv-00075-RFB-MDC in all future filings.

United States Magistrate Judge

Dated: 3/5/24